

LYONS & FLOOD, LLP  
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Attorneys for Defendants  
JEWEL MARITIME LTD., OASIS SHIP MANAGEMENT  
LLC, and OASIS MARITIME SERVICES LLC

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
MAN FERROSTAAL, INC.,

Plaintiff,

**ECF CASE**

07 Civ. 5835 (WHP) (KNF)

- against -

M/V DUBAI JEWEL, her engines, boilers, tackle,  
etc., JEWEL MARITIME LTD., OASIS SHIP  
MANAGEMENT LLC, OASIS MARITIME  
SERVICES LLC, SM CHINA CO., LTD.,

Defendants.  
-----X

**ANSWER TO CROSS-CLAIM OF SM CHINA CO., LTD.**

Defendants JEWEL MARITIME LTD., OASIS SHIP MANAGEMENT LLC, and  
OASIS MARITIME SERVICES LLC, by their attorneys, Lyons & Flood, LLP, as and for their  
Answer to the Cross-Claim of defendant SM CHINA CO., LTD. allege upon information and  
belief as follows:

1. Deny each and every allegation contained in paragraphs 16, 17, and 18 of  
defendant SM CHINA CO., LTD.'s Amended Answer with Cross-Claims.

**FIRST AFFIRMATIVE DEFENSE**

2. The Cross-Claims fail to state a claim upon which relief can be granted.

**SECOND AFFIRMATIVE DEFENSE**

3. The Court lacks jurisdiction over defendants *in personam*.

**THIRD AFFIRMATIVE DEFENSE**

4. Defendants incorporate their Answer, including Affirmative Defenses, to the Verified Complaint as if fully set forth herein.

WHEREFORE, defendants JEWEL MARITIME LTD., OASIS SHIP MANAGEMENT LLC, and OASIS MARITIME SERVICES LLC pray:

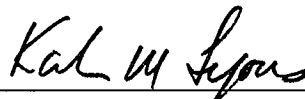
a. that judgment be entered dismissing defendant SM CHINA CO., LTD.'s Cross Claims in their entirety and awarding defendants JEWEL MARITIME LTD., OASIS SHIP MANAGEMENT LLC, and OASIS MARITIME SERVICES LLC their costs and disbursements incurred in this matter; and

b. that defendants JEWEL MARITIME LTD., OASIS SHIP MANAGEMENT LLC, and OASIS MARITIME SERVICES LLC have such other, further and different relief as this Court may deem just and proper.

Dated: January 15, 2008

LYONS & FLOOD, LLP  
Attorneys for Defendants  
JEWEL MARITIME LTD., OASIS SHIP  
MANAGEMENT LLC, and OASIS MARITIME  
SERVICES LLC

By: \_\_\_\_\_



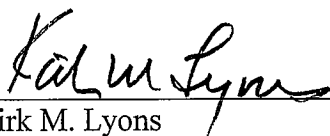
Kirk M. Lyons (KL-1568)  
65 West 36<sup>th</sup> Street, 7<sup>th</sup> Floor  
New York, New York 10018  
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**CERTIFICATE OF SERVICE**

Kirk M. Lyons, an attorney duly admitted to practice before this Honorable Court, affirms on this 15<sup>th</sup> day of January 2008, I served true copies of the foregoing, by U.S. Mail, first-class postage pre-paid, to:

KINGSLEY KINGSLEY & CALKINS  
Attorneys for Plaintiff  
MAN FERROSTAAL, INC.  
91 West Cherry Street  
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Kirk M. Lyons